

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BERNADINE T. GRIFFITH)
Plaintiff,)
v.) C.A. No. 03-CV-12573-EFH
ONEBEACON INSURANCE COMPANY,)
ONEBEACON AMERICA INSURANCE)
COMPANY, MICHAEL A. SISTO, and)
KAREN ALLEN HOLMES)
Defendants.)

)

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S EMERGENCY MOTION TO SEAL
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Now come the defendants in the above captioned Action, OneBeacon Insurance Company, OneBeacon America Insurance Company (together, “OneBeacon”), Michael A. Sisto, and Karen Allen Holmes (collectively, the “defendants”), in response to the plaintiff Bernadine T. Griffith’s (the “plaintiff” or “Ms. Griffith”) Emergency Motion to Seal Defendants’ Motion for Summary.

To the extent that the plaintiff’s Motion is viewed by the Court as it is entitled - as a motion to seal Defendants’ Motion for Summary Judgment – and not as an attack on whether Defendants’ Motion for Summary Judgment conforms with the Federal Rules of Civil Procedure, the Local Rules of Civil Procedure, and this Honorable Court’s rules for

submitting motions for summary judgment, the defendants' state that they have no objection to having the entirety of Defendants' Motion for Summary Judgment, including the initial motion, the memorandum of law, statement of facts, the declaration, and all supporting documents filed under seal so that absolutely none of the information exchanged over the course of this litigation is made public.

To the extent the plaintiff seeks additional time to respond to Defendants' Motion for Summary Judgment, the defendants state that they, through their counsel, made an unsolicited offer to the plaintiff to extend the filing deadline for her opposition by one week extending the filing deadline from August 5, 2005 to August 12, 2005, and stated that upon review of and agreement to the language included in a proposed motion, the defendants would assent to such a request. *See* Exhibit A, July 25, 2005 letter from Leah M. Moore to Kathleen J. Hill. The defendants maintain their original position and remain unopposed to providing the plaintiff with an additional week to respond to Defendants' Motion for Summary Judgment extending the filing deadline from August 5, 2005 to August 12, 2005.

Respectfully submitted,

ONEBEACON INSURANCE CO.,
ONEBEACON AMERICA
INSURANCE CO.,
MICHAEL A. SISTO, and
KAREN ALLEN HOLMES

By their attorneys

s/ Leah M. Moore

Keith B. Muntyan (BBO # 361380)
Leah M. Moore (BBO # 658217)
MORGAN, BROWN & JOY, LLP
200 State Street
Boston, MA 02109
617-523-6666 (phone)

Dated: July 26, 2005

CERTIFICATE OF SERVICE

I, Leah M. Moore, hereby certify that on this 26th day of July 2005, I caused a true and correct copy of the foregoing to be served via first class mail upon Kathleen J. Hill, Esq., Attorney for Plaintiff, Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, Massachusetts 02109, being the address designated by said attorney for service of all pleadings.

s/ Leah M. Moore

Leah M. Moore